



## **CSR Policy**

**Version 1.2**

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## **(I) SHORT TITLE**

- A.** This policy in relation to the Corporate Social Responsibility (“CSR”) of Silverskills Private Limited (“Company”) is titled as the “CSR Policy” and shall include any alterations, amendments or modifications hereto from time to time.

## **(II) VISION STATEMENT, OBJECTIVE AND APPLICABILITY**

- A.** The CSR Policy sets out our commitment to ensuring that our activities extend beyond commercial interests and include initiatives and endeavors for the benefit and development of the community and society
- B.** This CSR Policy has been framed in accordance with Section 135 and other applicable provisions of the Companies Act 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014 (the “CSR Rules”), and any amendment(s) thereof from time to time (collectively “the Act”).
- C.** Notwithstanding anything to the contrary contained in this CSR Policy but subject to applicable law, in the event that the CSR provisions under the Act, do not apply to the Company, it shall be entitled but not be obliged to:
1. Constitute/maintain the CSR Committee; and
  2. Comply with the provisions of this CSR Policy

till such time as it again meets the applicability criteria of the of the CSR provisions under the Act.

## **(III) CSR PROGRAMS AND IMPLEMENTATION**

- A.** The Company shall undertake its CSR activities in one or more of the areas as identified under Schedule VII of the Act.
- B.** The Company may undertake its CSR activities, either itself or through CSR Public Trust formed by the Company or through any other company registered under section 8 of the Act or Registered Public Trust or Registered Society that meet the applicable criteria required under the Act (“Implementing Agencies”), including by making contributions to such Implementing Agencies as may be permitted under the provisions of the Act..
- C.** The Company will focus on undertaking CSR programs (“CSR Programs”) in such phases and with such activities and such time schedules as may be decided by the CSR committee.

- D.** The Company shall give preference to the regions from where it operates in undertaking the above CSR programs. However, the Company may also consider other CSR programs while keeping in view the international, national, or state level priorities/objectives provided that such CSR activities fall within the permitted areas identified under the CSR Policy.
- E.** The Company may from time to time add to or modify its CSR areas, programs, projects, schedules and activities in accordance with the provisions of the Act and the CSR Rules.

#### **(IV.) CONSTITUTION OF THE CSR COMMITTEE**

- A.** The Board of the Company has constituted the CSR Committee in accordance with the provisions of the Act
- B.** The CSR Committee shall:
  - 1. formulate and/or amend the CSR Policy and recommend it to the Board, which shall indicate the CSR activities to be undertaken by the Company;
  - 2. recommend the amount of expenditure to be incurred on the CSR activities;
  - 3. monitor the CSR Policy of the company from time to time.
- C.** The CSR Committee shall formulate and recommend to the Board, an annual action plan (“Annual Action Plan”) in pursuance of the CSR policy, The CSR activities shall be undertaken in line with the Annual Action Plan approved by the Board. The Annual Action Plan shall, inter alia, contain the following information with respect to the CSR activities proposed to be undertaken by the Company:
  - 1. List of CSR activities to be undertaken in the areas or subjects of those specified in Schedule VII of the Act;
  - 2. Manner of execution;
  - 3. Modalities of utilisation of funds and implementation schedule for the projects or programs;
  - 4. Monitoring and reporting mechanism; and
  - 5. Details of need and impact assessment, if any, for the projects undertaken by the Company.
- D.** The CSR Committee shall ensure that implementation of CSR Activities is in accordance with the CSR Policy and the provisions of the Act.
- E.** CSR Committee may put in place a dedicated project team (“Project Team”) for implementation of the CSR Programs. The Project Team shall work under the guidance and support of the CSR Committee and the Board. The CSR Committee may empower the Project Team to finalize, approve and execute various agreements, deeds, writings, confirmations, undertakings or other documents, as may be necessary, with any party for the purposes of the CSR Policy and accept modifications, changes and amendments to any such documents/ agreements as it may deem fit.

## (V.) CSR BUDGET AND EXPENDITURE

- A. The CSR Committee shall recommend the total budget (“CSR Budget”) keeping in view the nature, scope and reach of the CSR programs/activities to be carried out and the Board shall ensure that the CSR expenditure, as determined in accordance with the provisions of the Act, is spent by the Company.

## (VI.) AMENDMENT

Any or all provisions of this CSR policy may be amended by the Board based on the recommendations of the CSR Committee or in accordance with any statutory guidelines that may be issued from time to time

### CSR Committee

S. no	Name of member	Designation
1	Rohit Arora	Chairman and Director
2	Arun Kumar Gupta	Director
3	Akshay Saluja	Whole Time Director

### Approved CSR Projects

Name of the Program	Brief details of the Project	
	Project Activities	Project Sector
Uneed	Providing computer education and curriculum support in other subjects	Education
	Imparting employment enhancing vocational skills	Livelihood enhancement
	Providing financial and non-financial assistance for education and vocational courses to the deserving-underprivileged students	Education and Livelihood enhancement

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